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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF MONTANA

BILLINGS DIVISION

UNITED STATES OF AMERICA,	
Plaintiff,	Case No. CR 24-93-BLG-SPW
vs. KRISTOFER MIKAL WRIGHT,	FOURTH UNOPPOSED MOTION TO CONTINUE PRETRIAL DEADLINES AND TRIAL DATE
Defendant.	

COMES NOW Defendant, KRISTOFER MIKAL WRIGHT, by and through Defendant's counsel of record, LISA J. BAZANT, and moves the Court for an order continuing the dates currently set for pretrial deadlines and trial date.

In support of his motion, Defendant states:

- 1. Undersigned counsel has obtained the discovery and initiated review with her client, who is currently housed in Big Horn County Detention Facility in Basin, Wyoming. Through the course of counsel's representation, Mr. Wright has identified and requested additional discovery not been previously disclosed by the Government, to include substantive text messages and electronic and aerial surveillance. Much of the materials requested have been received, including the aerial surveillance and photos, and counsel is working with counsel for the government, Thomas Godfrey, to obtain cell phone downloads. Following receipt, undersigned counsel will travel to Basin to review the discovery with her client. Counsel anticipates a travel/meeting date of February 12, 2025. Mr. Wright asserts that he needs complete discovery in order to effectively evaluate his case.
- 2. Based on the outstanding discovery requested, counsel currently is not able to assess whether relevant pretrial motions exist. Additionally, given the nature of the allegations and the potential sentence Defendant is facing, the undersigned requests a continuance of the pretrial deadlines and trial date.

 Counsel requests an additional 45 days to complete the tasks at hand.
- 3. Counsel has contacted Assistant U.S. Attorney Thomas Godfrey regarding the motion. Mr. Godfrey has no objection.

RESPECTFULLY SUBMITTED January 28, 2025.

/s/Lisa J. Bazant LISA J. BAZANT Attorney for Defendant

CERTIFICATE OF SERVICE L.R. 5.2(b)

I hereby certify that on January 28, 2025, a copy of the foregoing document was served on the following persons by the following means:

1 CM-ECF	
Hand Delivery	
2 Mail	
Overnight Delivery Service	
Fax	
E-Mail	
1.	
CLERK, UNITED STATES DISTRICT COURT	
Thomas Godfrey Assistant United States Attorney U.S. Attorney's Office Billings, MT	
2. Kristofer Mikal Wright	
/s/ Lisa J. Bazant LISA J. BAZANT Attorney for Defendant	